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IDAHO PUBLIC
UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT
APPLICATION OF IDAHO POWER
COMPANY AND SINCLAIR OIL
CORPORATION FOR THE SALE AND
TRANSFER OF CERTAIN COMPANY
OWNED FACILITIES

CASE NO. IPC-E-05-16

MOTION TO AMEND APPLICATION
TO INCLUDE A REQUEST FOR
WAIVER OF MASTER-METERING
RULE

Idaho Power Company ("Idaho Power") and Sinclair Oil Corporation, a Wyoming Corporation, d/b/a Sun Valley Company ("Sun Valley"), pursuant to RP 053 hereby JOINTLY request that the pending Application in this proceeding be amended to include a request that the Commission waive the requirements of Section 4 of Rule E, Idaho Power Company's rule governing master-metering, as applied to the transaction that is the subject of this Application.

In support of the Motion, Idaho Power and Sun Valley respectfully submit the following:

1. On May 2, 2005, Sun Valley and Idaho Power filed a Joint Application and Request for Modified Procedure seeking approval for the sale and transfer of certain Company-owned facilities from Idaho Power to Sun Valley. The Company-owned facilities at issue include facilities providing service to a number of individual tenants in the Sun Valley Mall.

2. Section 4 of Rule E, the Company's Master-Metering Standards, reads as follows:

4. Master-Metering and Individual Metering in Commercial Buildings and Shopping Centers. No unit of commercial buildings and shopping centers will be master-metered for electric service after July 1, 1980, if the units for their tenants contain an electric space heating, water heating, or air-conditioning (space cooling) unit that is not centrally controlled and over which the unit's tenants individually control electric usage. Tenants in otherwise master-metered buildings whose electric load exceeds the individual metering threshold found in the Company's Tariff must be individually metered.

3. In the course of responding to Commission Staff audit requests, it has come to the attention of Idaho Power and Sun Valley that a number of the tenants in the Sun Valley Mall currently receive electric service directly from Idaho Power and have the ability to individually control their electric space heating, water heating, or air conditioning unit.

4. If the Commission approves the sale and transfer of assets as requested in the Application, it is Sun Valley's intention to recover the costs of electric service provided to the tenants in the Sun Valley Mall by means of a monthly charge included as a part of the lease arrangement between Sun Valley and the individual

tenants in the Sun Valley Mall. As a result, Idaho Power and Sun Valley agree that a waiver of Rule E, Subsection 4, covering those tenants in the Sun Valley Mall that would be master-metered for electric service after Idaho Power transfers and sells the assets described in the Application to Sun Valley is necessary.

5. While the service to the tenants in the Sun Valley Mall will be provided under a master-metering arrangement, Sun Valley intends to take certain steps to assure that the spirit of the master-metering rules is maintained after the Company-owned facilities are transferred from Idaho Power to Sun Valley. The steps Sun Valley intends to take are generally described as follows:

a. Within 60 days of the transfer of the facilities to Sun Valley, Sun Valley will retrofit the individual thermostats for each of its tenants such that each thermostat will be centrally controlled by Sun Valley.

b. Sun Valley will provide to the Commission certification that the thermostat retrofit has been completed and that Sun Valley personnel centrally control the space heating and air conditioning units for the tenants in the Sun Valley Mall.

Water heating units utilized by the tenants in the Sun Valley Mall are used primarily for hand washing purposes only. No unit is larger than fifteen gallons. As such, energy used for water heating is minimal. Given this minimal use, Sun Valley requests that it not be required to centrally control the water heating units.

6. Based on the foregoing, Idaho Power and Sun Valley respectfully request that in addition to approving the sale and transfer of the Company-Owned Facilities as requested in the Application, that the Commission waive the requirements of Section 4 of Rule E to allow Sun Valley to deliver energy to its tenants as a part of its

lease arrangement with the tenants and not require that Idaho Power provide electric service to the tenants on an individual basis.

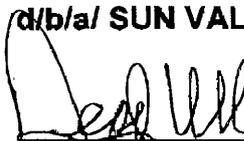
Dated this 13~~th~~ day of July, 2005.

IDAHO POWER COMPANY



Monica B. Moen
Attorney for Idaho Power Company

**SINCLAIR OIL CORPORATION
d/b/a/ SUN VALLEY COMPANY**



Dean J. Miller
Attorney for Sun Valley Company